

**EXHIBIT 15**

**Borrower-Related Causes of Action**

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The Debtors are or may be party to litigations, contested matters, claims objections, arbitrations or any other type of adversarial proceeding or dispute resolution proceeding, whether formal or informal, judicial or non-judicial with Borrowers. Unless otherwise released by the Plan, the Debtors expressly reserve and assign to the Borrower Claims Trust all claims, defenses, cross-claims, setoffs and counterclaims that the Debtors may have against Borrowers with respect to any Borrower Claim. .

In addition, the following is a list of known pending and potential Borrower Related Causes of Action:

Matter Name	Matter Number	Matter Summary	Matter Caption	Opened on Date	Allegation Type	Business Unit	Case Type	State/Province
LEE SALLY S	728468	HELOC issue. Borrower took advantage of an offer by GMAC to accept 3k as payment in full of her 40k LOC. Somehow a 70k check was issued to the borrower in error. The borrower claims certain phone reps told her the money was an overage, so she thought it belonged to her and has since spent some of it.	GMAC MORTGAGE LLC vs SALLY S LEE and DOES 1 through 20	05/9/2012	BK Stayed - No	ResCap - Estate	Lawsuit	California
CASAS HERMINA	732095	We have filed a lawsuit in this reverse mortgage case as we were never paid off when the borrower refinanced. We have alleged breach of contract, breach of implaied covenant of good faith and fair dealings, declaratory relief, restitution for unjust enrichmnet, and for money had and received.	GMAC Mortgage, LLC v. The Union Labor Life Insurance Company and Does 1 through 25, Inclusive.	08/30/2012	BK Stayed - No	ResCap - Estate	Lawsuit	California
KUBERT	2013-09-EQ5919	Case brought by GMACM for erroneous lien release by ETS. GMACM seeking a default judgment to reinstate the position of the liens. Borrower signed Rescission of Reconveyance and that has been recorded. Property Address: 657 Starbush Drive, Sunnyvale, CA	GMACM v. Kubert, et al	09/17/2013	BK Stayed - No	ResCap - Estate	Lawsuit	California

**EXHIBIT 15**

**Blackline**

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In addition, the following is a list of known pending and potential Borrower Related Causes of Action ~~[to come]~~:

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<a href="#">LEE SALLY S</a>	<a href="#">728468</a>	<a href="#">HELOC issue. Borrower took advantage of an offer by GMAC to accept 3k as payment in full of her 40k LOC. Somehow a 70k check was issued to the borrower in error. The borrower claims certain phone reps told her the money was an overage, so she thought it belonged to her and has since spent some of it.</a>	<a href="#">GMAC MORTGAGE LLC vs SALLY S LEE and DOES 1 through 20</a>	<a href="#">05/9/2012</a>	<a href="#">BK Stayed - No</a>	<a href="#">ResCap - Estate</a>	<a href="#">Lawsuit</a>	<a href="#">California</a>
<a href="#">CASAS HERMINA</a>	<a href="#">732095</a>	<a href="#">We have filed a lawsuit in this reverse mortgage case as we were never paid off when the borrower refinanced. We have alleged breach of contract, breach of impleaded covenant of good faith and fair dealing, declaratory relief, restitution for unjust enrichment, and for money had and received.</a>	<a href="#">GMAC Mortgage, LLC v. The Union Labor Life Insurance Company and Does 1 through 25, Inclusive.</a>	<a href="#">08/30/2012</a>	<a href="#">BK Stayed - No</a>	<a href="#">ResCap - Estate</a>	<a href="#">Lawsuit</a>	<a href="#">California</a>
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